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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

John Noble, Plaintiff, v. The Union Bank of California Long Term Disability Benefits Plan, Defendant.) No: C 08-00115 SI
} STIPULATION AND [PROPOSED] ORDER RE: CASE MANAGEMENT DATES

The parties in the above-captioned matter, through their respective attorneys of record, enter into the following stipulation and request the Court to enter an order accordingly:

1. On July 11, 2008, the Court heard oral argument on defendant's motion to dismiss plaintiff's complaint/ motion for summary judgment and took the matter under submission.

2. The initial case management conference in this matter is currently scheduled for August 15, 2008, at 2:00 p.m.

3. In the interest of economy, and so that the parties may discuss their respective positions relating to initial disclosure, discovery and ADR with the benefit of the Court's ruling on defendant's pending motion, the parties hereby stipulate and request that the Court continue the currently scheduled case management conference for forty nine (49) days.

4. The parties further stipulate and request that the Court correspondingly continue the dates the parties are required to meet and confer and exchange their initial disclosures. The proposed dates are as follows:

Case Management Conference: October 3, 2008, at 2:00 p.m.

Joint Case Management Statement: September 26, 2008

Initial Disclosures: September 26, 2008

Last Day to Meet and Confer: September 12, 2008.

Respectfully submitted,

ROBOOSTOFF & KALKIN

Dated: July 22, 2008

/s/
Scott Kalkin
Attorney for plaintiff

JONES DAY

Dated: July 22, 2008

By: /s/
Katherine S. Ritchey
Attorneys for Defendant

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1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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4 Dated:

5 By: 
6 Judge of the United States District
7 Court for the Northern District of
8 California
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